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CADEN WANG, and STEPHEN M. YOUNGWOOD

10 [Additional counsel appear on signature page.]

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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 PETE J. MANGER, On Behalf of Himself and All Others) Case Number 3:16-cv-01161
15 Similarly Situated,)
16 Plaintiff,)
17 v.)
18 LEAPFROG ENTERPRISES, INC., JOHN BARBOUR,)
WILLIAM B. CHIASSON, THOMAS J. KALINSKE, E.)
STANTON MCKEE, RANDY O. RISSMAN, CADEN)
WANG, and STEPHEN M. YOUNGWOOD,)
19)
20 Defendants.)
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All parties, through their undersigned counsel, hereby submit this Stipulation deferring Defendants' deadlines to respond to the complaint pursuant to Civil Local Rule 6-1(a), and vacating the initial case management conference.

RECITALS

A. On March 9, 2016, the above-captioned class action complaint was filed in this Court. The complaint alleges violations of the federal securities laws by LeapFrog Enterprises, Inc. and certain of its former officers and directors. (Dkt. No. 1.)

B. Upon commencement of the action, an initial case management conference was set for June 7, 2016, at 2:00 p.m. (Dkt. No. 4.)

C. This action is governed by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 et seq. (the “Reform Act”).

D. No additional meaningful litigation activity, beyond the relief Plaintiff Manger sought prior to the expiration of the Tender Offer, is expected until after the Court appoints lead plaintiff and lead counsel, at which point an amended complaint is likely to be filed by the appointed lead plaintiff and lead counsel. After an operative amended complaint is filed, defendants anticipate filing motions to dismiss that complaint.

E. Counsel for the undersigned parties agree that deferring the response deadlines for all defendants until after the Court appoints a lead plaintiff and lead counsel pursuant to the Reform Act is prudent and will conserve party and judicial resources. The parties further agree that an initial case management conference, attendant deadlines, and related ADR procedures are premature and should be deferred until the initial case management conference is reset.

STIPULATION

NOW, THEREFORE, the undersigned hereby stipulate, subject to Court approval, as follows:

1. The named defendants agree to accept service, through counsel, to the extent they have not yet been served.

2. The named defendants shall have no obligation to respond to the complaint until after the Court appoints a lead plaintiff and lead counsel.

3. Counsel for the named defendants will meet and confer with the Court-appointed lead counsel within fourteen days after the Court makes its appointment to discuss a schedule for filing of any amended complaint and defendants' responses, including their currently anticipated motion to dismiss.

4. The Case Management Conference that is presently scheduled for June 7, 2016 is hereby vacated and shall be reset in connection with the setting of the briefing schedule on defendants' anticipated motion to dismiss. The related deadlines, including ADR requirements, shall be deferred until after an initial case management conference is reset.

Dated: May 10, 2016

MORRISON & FOERSTER LLP
JORDAN ETH
MARK R.S. FOSTER
DAVID J. WIENER

By: /s/ Mark R.S. Foster
MARK R.S. FOSTER

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1 Dated: May 10, 2016

2 **FARUQI & FARUQI, LLP**

3 By: /s/ James M. Wilson, Jr.

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27 Attorneys for Plaintiff
28 PETE J. MANGER

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ORDER

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Pursuant to stipulation, it is SO ORDERED.

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HON. WILLIAM H. ORRICK
United States District Court Judge

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Dated: May 10, 2016

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